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ATTORNEYS FOR DEFENDANTS

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**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION**

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JOSHUA CHATWIN,

Plaintiff,

v.

DRAPER CITY; DRAPER CITY POLICE  
DEPARTMENT; POLICE CHIEF MAC  
CONNOLE; OFFICER J. PATTERSON, in his  
individual and official capacity; OFFICER  
DAVID HARRIS, in his individual and official  
capacity; OFFICER HEATHER BAUGH, in  
her individual and official capacity; and JOHN  
DOES 1-10,

Defendants.

**STIPULATED MOTION FOR  
PROTECTIVE ORDER**

Civil No. 2:14-cv-00375  
Judge Dale A. Kimball

The parties, Plaintiff Joshua Chatwin and Defendants Draper City, Draper City Police Department, Police Chief Mac Connole, Officer J. Patterson, Officer David Harris, and Officer

Heather Baugh respectfully move for entry of the attached Stipulated Protective Order. Good cause exists to enter the Protective Order because the parties have stipulated to its terms and the parties expect that discovery in this case will involve the exchange of personal or sensitive information. The attached Protective Order would govern the dissemination of this type of information and would help maintain its confidentiality. Accordingly, the parties respectfully request that this Court enter the attached Stipulated Protective Order.

DATED this 3rd day of November, 2015.

**DURHAM JONES & PINEGAR, P.C.**

/s/ R. Blake Hamilton

R. Blake Hamilton

Ashley M. Gregson

ATTORNEYS FOR DEFENDANTS

DATED this 3rd day of November, 2015.

**CLYDE SNOW & SESSIONS**

/s/ Lisa Marcy (by permission)

Lisa Marcy

ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the **STIPULATED MOTION FOR PROTECTIVE ORDER** was served this 3rd day of November, 2015, via electronic filing upon the following:

Lisa A. Marcy  
AARON & GIANNA, PLC  
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Salt Lake City, UT 84106

John K. Johnson  
JOHN K. JOHNSON, LLC  
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/s/ Sarah Peck  
Secretary